

EXHIBIT G –

**BJH 5-27-22 Response to Plaintiff's Second Request to Produce to
All Defendants**

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

JEFFERY WEISMAN, and STRATEGIC BIOMEDICAL, INC,)	
)	
)	
Plaintiffs,)	No. 4:19-cv-75-JAR
v.)	
)	The Honorable John A. Ross
)	
BARNES JEWISH HOSPITAL,)	
BJC HEALTHCARE,)	
WASHINGTON UNIVERSITY,)	
ALEX EVERS,)	
RICHARD BENZINGER, and)	
THOMAS COX,)	
)	
Defendants.)	

**DEFENDANT BARNES-JEWISH HOSPITAL’S OBJECTIONS AND RESPONSES TO
PLAINTIFF’S SUPPLEMENTAL RULE 34 REQUEST TO PRODUCE**

Defendant Barnes-Jewish Hospital (“BJH”) provides the following supplemental objections and responses to Plaintiff’s Second Supplemental Rule 34 Request to Produce to Each Defendant dated March 26, 2022.

REQUESTS

1. All documents showing costs or expenses incurred because of Plaintiff’s alleged photographing of certain of George Benzinger’s emails.

ANSWER: BJH will produce redacted invoices relating to the investigation and prosecution of the counterclaim at the close of discovery and supplement as necessary and will produce any other non-privileged responsive documents. BJH states that the investigation and discovery are ongoing, and it reserves its right to supplement this request as additional information becomes available. To the extent Request No. 1 asks for more, BJH objects to Request No. 1 because the terms “costs or expenses” are undefined, unclear, vague, ambiguous, subject to varying interpretations, overly broad, and unduly burdensome. BJH further objects to Request No. 1 as overly broad, unduly burdensome, and not proportional to the needs of this case. BJH further objects to Request No. 1 to the extent it seeks documents protected by the attorney-client

privilege and/or work product doctrine.

Respectfully submitted as to objections,

HUSCH BLACKWELL LLP

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on May 27, 2022, a true and accurate copy of the foregoing was electronically served upon all counsel of record.

/s/ Blake R. Armstrong